

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY MORRIS, TARAS KICK, : Civil Action No. 08-CV-0592(HB)
REBECCA SALAWDEH and STACEY :
ANTALEK, on Behalf of Themselves and All :
Others Similarly Situated, :
Plaintiffs, : NOTICE OF MOTION AND MOTION TO
vs. : ADMIT JOHN J. STOIA, JR. *PRO HAC VICE*
: :
CBS BROADCASTING, INC., CBS :
CONSUMER PRODUCTS, PLANET TOYS, :
INC., TOYS "R" US, INC., WALGREEN CO. :
and HAMMACHER SCHLEMMER & CO., :
INC., :
Defendants. :
X

JUN 20 2008

PL 205-654628

PLEASE TAKE NOTICE upon the annexed Declaration of Joseph P. Guglielmo in Support of the Motion to Admit John J. Stoia, Jr. *Pro Hac Vice* and the Certificate of Good Standing attached thereto, plaintiffs Jeffrey Morris, Taras Kick, Rebecca Salawdeh and Stacey Antalek move this Court, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that John J. Stoia, Jr., a member of the Bar of the State of California and a partner at the law firm of Coughlin Stoia Geller Rudman & Robbins LLP, be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

DATED: June 19, 2008

WHATLEY, DRAKE & KALLAS, LLC
JOE R. WHATLEY, JR.
EDITH M. KALLAS
JOSEPH P. GUGLIELMO
ELIZABETH ROSENBERG



JOSEPH P. GUGLIELMO

1540 Broadway, 37th Floor
New York, NY 10036
Telephone: 212/447-7070
212/447-7077 (fax)

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
JOHN J. STOIA, JR.
RACHEL L. JENSEN
PHONG TRAN
THOMAS J. O'REARDON II
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
JACK REISE
ELIZABETH A. SHONSON
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

PUBLIC JUSTICE, P.C.
ARTHUR H. BRYANT
VICTORIA W. NI
555 12th Street, Suite 1620
Oakland, CA 94607
Telephone: 510/622-8150
510/622-8155 (fax)

BRAYTON PURCELL LLP
ALAN R. BRAYTON
PETER FREDMAN
GREGORY SHEFFER
222 Rush Landing Road
Novato, CA 94948-6169
Telephone: 415/898-1555
415/898-1247 (fax)

Attorneys for Plaintiffs Taras Kick, Rebecca Salawden and Stacey Antalek

KAMBEREDELSON, LLC
SCOTT A. KAMBER
DANA B. RUBIN
11 Broadway, 22nd Floor
New York, NY 10004
Telephone: 212/920-3072
212/202-6364 (fax)

GOLDENBERG HELLER ANTOGNOLI
ROWLAND SHORT & GORI, P.C.
RANDY L. GORI
2227 South State Route 157
Edwardsville, IL 62025
Telephone: 618/656-5150
618/656-8169 (fax)

GLASSMAN, EDWARDS, WADE &
WYATT, P.C.
B.J. WADE
26 N. Second Street
Memphis, TN 38103
Telephone: 901/527-4673
901/521-0940 (fax)

AUDET & PARTNERS, LLP
WILLIAM M. AUDET
221 Main Street, Suite 1460
San Francisco, CA 94105
Telephone: 415/568-2555
415/568-2556 (fax)

Attorneys for Plaintiff Jeffrey Morris

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2008, I caused a true and correct copy of the foregoing Motion to Admit John J. Stoia, Jr. *pro hac vice*, Affidavit of Joseph P. Guglielmo in Support of Motion to admit John J. Stoia, Jr. *pro hac vice*, Certificates of Good Standing and [Proposed] Order on Admission to Practice *Pro Hac Vice* to be sent to all attorneys of record via first class mail.

Elizabeth Rosenberg
Elizabeth Rosenberg

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY MORRIS, TARAS KICK, : Civil Action No. 08-CV-0592(HB)
REBECCA SALAWDEH and STACEY :
ANTALEK, on Behalf of Themselves and All :
Others Similarly Situated, :
Plaintiffs, :
vs. :
CBS BROADCASTING, INC., CBS :
CONSUMER PRODUCTS, PLANET TOYS, :
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and HAMMACHER SCHLEMMER & CO., :
INC., :
Defendants. :
:

X

I, Joseph P. Guglielmo, declare as follows:

1. I am a member in good standing of the bar of this Court and a partner at Whatley, Drake & Kallas, LLC. I make this declaration in support of plaintiffs Jeffrey Morris, Taras Kick, Rebecca Salawdeh and Stacey Antalek's Motion to Admit John J. Stoia, Jr. *Pro Hac Vice*, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, requesting that John J. Stoia, Jr. be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

2. John J. Stoia, Jr. is fully familiar with this action.

3. John J. Stoia, Jr. is an attorney in good standing of the Bar of the State of California, as evidenced by the annexed certificate.

4. I respectfully request that plaintiffs' motion be granted in all respects. A proposed order is enclosed herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 19 th day of June, 2008 at New York, New York.



JOSEPH P. GUGLIELMO



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

JOHN J. STOIA, JR.

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that JOHN J. STOIA, JR. was on the 6th day of October 1989, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court,
this 9th day of June, 2008.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By *Joseph Cornetta*
Joseph Cornetta, Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEFFREY MORRIS, TARAS KICK, : Civil Action No. 08-CV-0592(HB)
REBECCA SALAWDEH and STACEY :
ANTALEK, on Behalf of Themselves and All :
Others Similarly Situated, :
Plaintiffs, :
[PROPOSED] ORDER GRANTING :
MOTION FOR ADMISSION OF JOHN J. :
STOIA, JR. *PRO HAC VICE* :
vs. :
CBS BROADCASTING, INC., CBS :
CONSUMER PRODUCTS, PLANET TOYS, :
INC., TOYS "R" US, INC., WALGREEN CO. :
and HAMMACHER SCHLEMMER & CO., :
INC., :
Defendants. :
X

Upon the motion of plaintiffs Jeffrey Morris, Taras Kick, Rebecca Salawdeh and Stacey Antalek pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for an order admitting John J. Stoia, Jr. *pro hac vice* for all purposes on behalf of plaintiffs in this action, and for good cause shown,

IT IS HEREBY ORDERED that the motion is GRANTED in all respects, subject to payment of the requisite fees.

DATED: _____

THE HONORABLE HAROLD BAER, JR.
UNITED STATES DISTRICT JUDGE